

Exhibit 39

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By: Leah Kagan (NJ ID No. 013602009)

Attorneys for Plaintiffs

**VALERIE JO DALIS and
NICHOLAS J. DALIS,**

Plaintiffs,

v.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-MIDDLESEX
COUNTY

DOCKET NO.

BRENNTAG NORTH AMERICA, INC.
(sued individually and as successor-in-interest
to MINERAL PIGMENT SOLUTIONS, INC.
as successor-in-interest to WHITTAKER,
CLARK & DANIELS, INC.);

BRENNTAG SPECIALTIES, INC. f/k/a
MINERAL PIGMENT SOLUTIONS, INC. as
a successor-in-interest to WHITTAKER,
CLARK & DANIELS, INC.;

COLGATE-PALMOLIVE COMPANY
(sued individually and as successor-in-interest
to THE MENNEN COMPANY);

CONAIR CORPORATION;

CYPRUS AMAX MINERALS COMPANY
(sued as successor to SIERRA TALC
COMPANY and UNITED TALC
COMPANY);

CIVIL ACTION
ASBESTOS LITIGATION

ORIGINAL COMPLAINT AND
DEMAND FOR TRIAL BY JURY

WHITTAKER CLARK & DANIELS, INC.,

JOHN DOE CORPORATIONS 1-50

(fictitious);

Defendants.

Plaintiffs, by way of Complaint against Defendants, upon information and belief allege as follows:

PARTIES -- PLAINTIFFS

1. Plaintiffs, Valerie Jo Dalis and Nicholas J. Dalis, reside at [REDACTED] San Jose, California 95110.

2. From approximately 1965 to 1972, Plaintiff Valerie Jo Dalis was exposed to asbestos from her and her co-workers' use of Mennen Shave Talc and Conair Hair Dryers while employed as a student and hair dresser at various beauty shops in San Jose, California. Plaintiff Valerie Jo Dalis was further exposed to asbestos through her personal use of Cashmere Bouquet talcum powder products from approximately 1957 to the 1990s. Plaintiff Valerie Jo Dalis' regular and frequent use of Mennen Shave Talc, Conair Hair Dryers, and Cashmere Bouquet talcum powder generated dust and exposed Plaintiff Valerie Jo Dalis to respirable asbestos fibers.

As a direct and proximate result of the above exposures, Plaintiff Valerie Jo Dalis contracted mesothelioma and has suffered, and continues to suffer, from other various diverse injuries and attendant complications.

3. Plaintiffs bring this action on behalf of themselves.

4. Plaintiffs claim damages as a result of:

 x loss of consortium (per quod)

 x loss of services

 x economic loss

 x pain and suffering

CERTIFICATION

I hereby certify that to my knowledge the within matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated with the exception of a possible workers' compensation claim. I have no knowledge at this time of any non-party who should be joined in this action.

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ATTORNEYS FOR PLAINTIFFS

Dated: August 11, 2015